

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ADNAN ABOU AYYASH,

Plaintiff,

v.

BANK AL-MADINA, UNITED CREDIT
BANK, RANA ABDELRAHIM
KOLEILAT, TAHA ABDELRAHIM
KOLEILAT, BASSEL ABDELRAHIM
KOLEILAT, RENE MOAWAD,
JOUMANA MOHAMAD AYYAS and
JOHN DOES 1-10,

Defendants.

04 Civ. 9201 (GEL)

**AFFIDAVIT IN SUPPORT
OF PLAINTIFF'S MOTION
FOR EXPEDITED
DISCOVERY AND EX
PARTE ORDER OF
ATTACHMENT**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

John Walzer, being duly sworn, hereby deposes and says:

1. I am a Managing Director and Senior Investigator at Fortress Global Investigations Corporation ("Fortress Global"), located at 350 Fifth Avenue, New York, NY 10118. Among other things, Fortress Global engages in the business of international private investigations and security.

2. Plaintiff in this matter, Dr. Adnan Abou Ayyash, engaged Fortress Global in 2004 to perform an investigation on his behalf into the 2003 collapse of Bank Al-Madina and its sister bank, United Credit Bank.

3. The lead investigators on this engagement are myself and Tom Vinton, former supervisory Special Agents of the Federal Bureau of Investigation, each with over twenty-four years of experience.

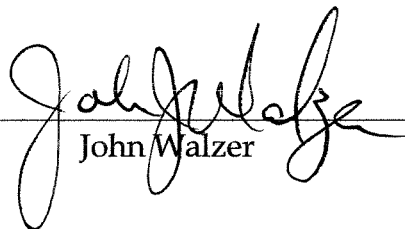
4. Fortress Global prepared a report on the collapse of Bank Al-Madina and United Credit Bank on the basis of its investigation conducted around the world (the "Report"). A copy of the Report is attached hereto. In some cases, Fortress Global obtained information from confidential sources.

5. To the best of my knowledge and belief, the information contained in the Report is accurate.

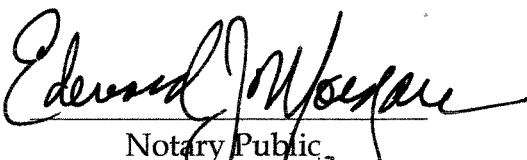
6. Our investigation indicates that Dr. Ayyash has lost at least \$1 billion as a result of the scheme perpetrated by defendants.

7. We have not uncovered any legitimate claims defendants may have against Dr. Ayyash.

8. The results of our investigation give us a reasonable belief that defendants are unlikely to satisfy a judgment against them rendered by a U.S. court.


John Walzer

Sworn to before me on
this 4th day of JUNE 2005.


Notary Public
EDWARD J. MORGAN
Notary Public, State of New York
No. 60-8014040
Qualified in Westchester County
Commission Expires March 30, 2007